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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 BRIAN SPILSBURY, an individual and as trustee of THE
 11 BRIAN E. SPILSBURY TRUST; DEE ANN
 12 SPILSBURY, an individual; KEVIN SPILSBURY, an
 individual and as trustee of THE KEVIN J. SPILSBURY
 13 TRUST; ANTHONETTE SPILSBURY, an individual;
 14 JOINT FORCES, LLC, a Nevada limited liability
 company; PREMIER MECHANICAL, LLC, a Nevada
 15 limited liability company; CREST RIDGE, LLC; a
 Nevada limited liability company; R. GLENN WOODS,
 16 as trustee of THE KEVIN J. SPILSBURY 2000 TRUST
 and THE BRIAN E. SPILSBURY 2000 TRUST,

17
 18 Plaintiffs,

19 v.

20 U.S. SPECIALTY INSURANCE COMPANY, a Texas
 21 corporation; AMERICAN CONTRACTORS
 INDEMNITY COMPANY, a California corporation;
 22 HCC SURETY GROUP, a Texas corporation; TEXAS
 23 BONDING COMPANY, a Texas corporation; UNITED
 STATES SURETY COMPANY, a Maryland corporation;
 24 MTC FINANCIAL, INC., d/b/a TRUSTEE CORPS, a
 California corporation; DOES I through X, inclusive; and
 25 ROE ENTITIES I through X, inclusive

26 Defendants.
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 28

Case No.: 2:14-cv-000820

**STIPULATION AND ORDER TO
 STAY THE DECISION ON
 PLAINTIFF'S MOTION FOR
 DECLARATORY RELIEF AND
 PARTIAL SUMMARY
 JUDGMENT (#38) AND U.S.
 SPECIALTY INSURANCE
 COMPANY'S COUNTERMOTION
 FOR SUMMARY JUDGMENT
 (#44) PENDING SETTLEMENT
 DISCUSSIONS**

(FIRST REQUEST)

1 U.S. SPECIALTY INSURANCE COMPANY, a Texas
2 corporation;

3 Counterclaimants,

4 v.

5 R. GLENN WOODS, as trustee of THE KEVIN J.
6 SPILSBURY 2000 TRUST and THE BRIAN E.
7 SPILSBURY 2000 TRUST,

8 Counterdefendants,

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10 U.S. SPECIALTY INSURANCE COMPANY, a Texas
11 corporation;

12 Third Party Plaintiffs,

13 v.

14 BRIAN SPILSBURY, an individual and as trustee of
15 THE BRIAN E. SPILSBURY TRUST; DEE ANN
16 SPILSBURY, an individual; KEVIN SPILSBURY, an
17 individual and as trustee of THE KEVIN J. SPILSBURY
18 TRUST; ANTHONETTE SPILSBURY, an individual;
19 JOINT FORCES, LLC, a Nevada limited liability
20 company; PREMIER MECHANICAL, LLC, a Nevada
21 limited liability company; and CREST RIDGE, LLC; a
22 Nevada limited liability company; ANGELO
23 CARVALHO, an individual; CAM CONSULTING,
24 INC., a domestic corporation;

25 Third Party Defendants.

26
27 Defendants, U.S. Specialty Insurance Company (“USSIC”) and American Contractors
28 Indemnity Company (“ACIC”) (collectively “the Surety Defendants”) and Plaintiffs, by and through
their respective undersigned counsel of record, hereby stipulate to stay the Court’s decision on
Plaintiff’s Motion for Declaratory Relief and Partial Summary Judgment (#38) and U.S. Specialty

1 Insurance Company's Countermotion for Summary Judgment (#44), while settlement discussions are
2 pending.

3 The action was ordered to a settlement conference on June 25, 2015(#67, #69, and #84).
4 However, the settlement conference was unsuccessful (#87). Despite the unsuccessful settlement
5 conference, the parties have continued to discuss settlement and are earnestly involved in settlement
6 discussions.

7 To enhance the likelihood of settlement, the parties request a sixty day stay regarding the
8 entry of any decision by the Court concerning the pending Motions for Summary Judgment (#38,
9 #44). This stipulated stay may also assist the Court in administering the Court's docket.

10 The stay is not requested to delay the proceedings or in bad faith but rather to enhance and
11 promote the possibility of settlement. The requested stay will not impact the progress of this case
12 because discovery is stayed pending a decision by the Court regarding the pending Motions for
13 Summary Judgment (#55).

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Any party has the right to notify the Court that an impasse regarding settlement has been reached and the stay order will immediately be lifted as a result of such notice.

DATED this 24th day of July 2015.

DATED this 24th day of July 2015.

/s/ Kurt C. Faux

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Attorneys for Plaintiffs

IT IS SO ORDERED.


Gloria M. Navarro, Chief Judge
United States District Court

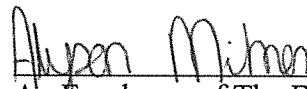
DATED: 07/28/2015.

CERTIFICATE OF SERVICE

The undersigned, an employee of The Faux Law Group, hereby certifies that on the 24th day of July 2015, I served a copy of the foregoing document, **STIPULATION AND ORDER TO STAY THE DECISION (#57) ON PLAINTIFF'S MOTION FOR DECLARATORY RELIEF AND PARTIAL SUMMARY JUDGMENT (#38) AND U.S. SPECIALTY INSURANCE COMPANY'S COUNTERMOTION FOR SUMMARY JUDGMENT (#44) PENDING SETTLEMENT DISCUSSIONS**, electronically, by the Court's CM/EF system and by placing a copy in an envelope, postage fully prepared, in the U.S. Mail at Henderson, Nevada, said envelope(s) addressed to:

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